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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

-----X

IN RE:

CASE NO.: 25-10323-JNP

Daniel Torres,

CHAPTER 13

Debtor.

Judge: Jerrold N. Poslusny, Jr.

-----X

NOTICE OF OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

PLEASE TAKE NOTICE that SN Servicing Corporation as Servicer for U.S. Bank Trust National Association, as Trustee of LB-Igloo Series IV Trust ("Secured Creditor"), the holder of a mortgage on real property of the Debtor, located at 540 Diamond Spring Avenue, Lawnside, NJ 08045 by and through its undersigned attorneys, hereby objects to the confirmation of the Chapter 13 Plan on grounds including:

1. Debtor filed a Chapter 13 Plan (Doc.: 3) on January 13, 2025.
2. Debtor's proposed plan is insufficient to provide for the claim of Secured Creditor. Upon review of internal records, the objecting creditor is due pre-petition arrearages of approximately \$73,851.84 to be set forth in a Claim to be filed by the Claims Deadline (March 24, 2025).
3. Debtor's proposed plan appears to contemplate that there will be no cure for the prepetition arrears of Secured Creditor unless or until a loan modification is achieved. The requirements of 11 U.S.C. 1322(d)(2) do not provide for payment over a period longer than 5 years. Moreover, the debtor(s) are obligated to cure the arrears due to the objecting creditor within a reasonable time pursuant to 11 U.S.C. 1322(b)(5). Accordingly, in the event that the ongoing loss mitigation efforts are not successful, the plan

fails to satisfy the confirmation requirements of 11 U.S.C. 1325(a)(1). As Debtor's plan is dependent on the approval of a loan modification, confirmation must be denied.

4. Debtor's proposed plan fails to comply with the requirements of the Bankruptcy Code and may not be proposed in good faith.

5. Debtor's proposed plan fails to comply with other applicable provisions of Title 11.

In the event any portion of the claim is deemed to be an unsecured claim as defined by the Code, objection is hereby made pursuant to 11 U.S.C. 1325(a)(4) and 1325(b), *et seq.* unless the plan provides for full payment of the claim.

Dated: February 10, 2025
Garden City, New York

By: /s/ Charles Wohlrab
Charles Wohlrab, Esq.
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Caption in Compliance with D.N.J. LBR 9004-1(b)

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In Re:
Daniel Torres
Debtor

Case No.: 25-10323-JNP

Chapter: 13

Adv. No.:

Hearing Date:

Hon. Judge: Jerrold N. Poslusny, Jr.

CERTIFICATION OF SERVICE

1. I, Megan Day:

☐ represent _____ in this matter.

☒ am the secretary/paralegal for Charles Wohlrab, Esq., who represents
U.S. Bank Trust National Association, as Trustee of LB-Igloo Series IV Trust in this matter.

2. On February 10, 2025, I sent a copy of the following pleadings and/or documents to the parties listed
in the chart below.

- Objection to Plan (NJ)

3. I certify under penalty of perjury that the above documents were sent using the mode of service
indicated.

Date: February 10, 2025

/s/ Megan Day
Signature

Name and Address of Party Served	Relationship of Party to the Case	Mode of Service
Daniel Torres 32 Berkshire Drive Sewell, NJ 08080	Debtor(s)	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other_____ (as authorized by the court *)
Andrew T. Archer 125 Route 73 North West Berlin, NJ 08091	Debtor(s) Attorney	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other_____ (as authorized by the court *)
Andrew B. Finberg 535 Route 38 Suite 580 Cherry Hill, NJ 08002	Bankruptcy Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other_____ (as authorized by the court *)
U.S. Trustee US Dept of Justice Office of the US Trustee One Newark Center Ste 2100 Newark, NJ 07102	U.S. Trustee	<input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other_____ (as authorized by the court *)